

1 Vanessa R. Waldref  
2 United States Attorney  
3 Eastern District of Washington  
4 Richard R. Barker  
5 Assistant United States Attorneys  
6 Post Office Box 1494  
7 Spokane, WA 99210-1494  
8 Telephone: (509) 353-2767

9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

Case No.: 2:21-CR-00049-WFN-1

12 Plaintiff,

13 v.

UNITED STATES' MOTION TO  
EXTEND BRIEFING SCHEDULE AND  
MOTION TO CONTINUE PRETRIAL  
HEARING

14 RONALD CRAIG ILG (a/k/a  
15 "SCAR215"),

16 Defendant.

17 The United States of America, by and through Vanessa R. Waldref, United States  
18 Attorney for the Eastern District of Washington, and Richard R. Barker, Assistant United  
19 States Attorney, respectfully submit the following unopposed motion to extend the  
20 briefing schedule in this matter and continue the pretrial conference set for March 21,  
21 2022, at 9:00 a.m.

22 **DISCUSSION**

23 Trial in this matter is currently scheduled for September 19, 2022. The parties are  
24 not seeking a continuance of the trial date or of any other pretrial deadlines, aside from  
25 the briefing schedule and the motion hearing set for March 21, 2022.

26 On March 1, 2022, Defendant filed four pretrial motions in this matter. ECF Nos.  
27 95, 97, 99-100. These include a motion to suppress evidence allegedly obtained in  
28 violation of *Miranda* (ECF No. 95), a motion to suppress evidence allegedly derivative  
of a search warrant (ECF No. 97), a motion to dismiss Count 3 of the Superseding  
Indictment (ECF No. 99), and a motion for Dr. Ilg to appear in dress clothing at

1 subsequent pretrial hearings (ECF No. 100). The motions themselves total approximately  
 2 75 pages, and they are accompanied by declarations and exhibits totaling another 154  
 3 pages. *See* ECF No. 95, 97, 99-100.

4 As the United States referenced at the pretrial conference on February 23, 2022,  
 5 the United States was uncertain whether a week would be sufficient for the government  
 6 to make an appropriate response to Defendant's motions. The Court also noted at the  
 7 hearing that it may require additional time to consider Defendant's motions.

8 Based on the foregoing, the parties have agreed upon on the following adjustment  
 9 for the current briefing and pretrial conference schedule. The proposed  
 10 extensions/adjustments also will provide Defense with additional time to respond to the  
 11 motions and ensure the Court has adequate time to review the motions and apprise itself  
 12 of the relevant issues and facts prior to the pretrial conference:

13 Government's Response Deadline: May 19, 2022

14 Defendant's Reply Deadline: June 2, 2022

15 Pretrial Conference: June 16, 2022, at 9:00 a.m.

16 On March 9, 2022, the United States consulted with counsel for the defense for the  
 17 defense's position on a continuance/extension of the briefing schedule. Defense Counsel  
 18 does not oppose the continue or the dates noted above.

19 Finally, an extension of the pretrial schedule will not unfairly prejudice Defendant.  
 20 Because Defendant has already signed a Speedy Trial waiver through the September trial  
 21 date, no further waiver is necessary. Moreover, at the current time, the Speedy Trial clock  
 22 is stopped in light of Defendant's pending motions. *See* 18 U.S.C. § 3161(h)(1)(D) (any  
 23 "delay resulting from any pretrial motion, from the filing of the motion through the

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1 conclusion of the hearing on” and “prompt disposition of[] such motion” is excluded in  
2 “computing the time within which the trial . . . must commence.”).

3 Dated this 9th day of March 2022.

4 Vanessa R. Waldref  
5 United States Attorney

6 s/ Richard R. Barker  
7 Richard R. Barker  
8 Assistant United States Attorney  
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11  
12 **CERTIFICATION**

13 I hereby certify that on March 9, 2022, I electronically filed the foregoing with  
14 the Clerk of the Court and counsel of record using the CM/ECF System.

15 s/Richard R. Barker  
16 Richard R. Barker  
17 Assistant United States Attorney  
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